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OFFICE OF GENERAL
COUNSEL

Federal Elections Commission
Office of Complaints Examination and
Legal Administration
Attn. Frankie Hampton
999 E Street, NW
Washington, DC 20436

RE: MUR 6888

Ladies and Gentlemen:

I serve as the Treasurer of the Arizona Republican Party ("AzGOP") and write in regard the Matter Under Review noted above. The AzGOP views the complaint and supplemental complaint filed in this matter to be entirely politically motivated to antagonize Republicans and divert Party time and attention from legitimate matters. The complaint fails to state any facts or cite any legal findings which amount to a violation by the AzGOP of the Federal Campaign Act of 1971 and/or the array of regulations adopted by the Federal Elections Commission to implement the Act. We urge the Federal Elections Commission to move quickly to dismiss this matter as there is no legal or factual basis to proceed with any further investigation.

During 2013 and early 2014 the AzGOP contacted a number of data and information technology vendors to evaluate the merits of their products for our use in the 2014 campaign. We chose to engage I360 because they provided superior products at cost efficient prices. Prior to choosing to work with I360 we reviewed offerings from Trailblazer, Nationbuilder and rVotes. The products offered by I360 were priced competitively with the alternatives and, in our estimation, were technically superior. Nonetheless, our decision to choose I360 was the product of a careful evaluation of marketplace alternatives.

Our agreement with I360 was essentially a list exchange. The AzGOP purchased data from Arizona's various counties. I360 received the data we provided them and simply allowed Party users to access this data using their applications. We are aware that several other Arizona campaign committees likewise were clients of I360. I360 informed us that we would not have access to any unique data these campaigns generated from their own efforts and that they would not have access to any data that our volunteers created. This reality is completely contrary to the scenario laid out in the complaint.

The staff of the AzGOP was aware that I360 has a variety of other clients and our I360 representative repeatedly made us aware that the firm had carefully designed and implemented legally sufficient firewalls to ensure that the data we were sending and receiving from I360 was not being used in a way that might constitute a violation of law. Our I360 representative made it clear that he was our key contact and that we were to direct all inquiries through him so that other I360 representatives could be screened from this engagement. We were repeatedly informed that I360 did not share client data among clients and that any arrangements we might make with our Republican candidates regarding data sharing had to be direct agreements among the committees and that I360 would not serve as a conduit for data sharing. As part of our training on utilization of the I360 applications it was made clear that data had value and that any sharing of data among committees certainly constituted a contribution of one kind or another among the committees. I360 had a clear understanding of the coordination and in-kind contributions laws and they had simple but clear firewalls in place to prevent unintentional data sharing. Again, the reality of our utilization of the I360 products is vastly different from the scenarios described in the complaint.

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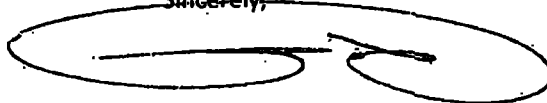
We have no evidence to support the assertion that the data provided to the AzGOP was illegally enhanced in a way that might amount to coordination or receipt of an illegal contribution from any third party entity. From our perspective our relationship with I360 was no different from that which we have with media outlets in the area that we purchase TV or radio time from. Those vendors work with any and all campaigns. Certainly any customer of a TV or radio station can obtain market intelligence based upon the current cost or availability of time but such knowledge is not the product of any "coordination" between the Party and the station. Likewise, not every customer pays exactly the same price to air an ad but the fact the someone bought a large block of airtime or purchased time far in advance does not amount to an illegal contribution from the station to the customer.

The AzGOP is confident that its contractual relationship with I360 is entirely legal and that the firm did not provide any illegal contribution to the Party or serve as a conduit for any illegal coordination with other politically active groups. The complaint is based upon hearsay and relies almost entirely on newspaper or blog information. There is every reason to believe the information from these sources is overly simplistic and/or includes a substantial amount of "spin" from the source. Importantly, this information is hearsay and inherently unreliable. We urge the Commission to close this matter as there is no basis to proceed forward.

Please let me know of any questions or concerns.

Thank you.

Sincerely,



Timothy Lee
Treasurer
Arizona Republican Party

11/20/2015

cc: Robert Graham
Chad Heywood
Lee Miller